



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 8, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's Order dated November 3, 2021, ordering the Government to docket a letter with a proposal from legal counsel at the Metropolitan Detention Center ("MDC") regarding what additional steps can be taken to ensure that the defendant promptly receives her legal mail within the weeks leading up to trial (Dkt. No. 412).

Legal counsel at the MDC informed the Government of the following: MDC mail room staff will continue to pick up legal mail from the post office once every business day and follow the processes outlined in the Government's November 1, 2021 letter (Dkt. No. 403). As to electronic discovery sent to legal counsel at the MDC, staff at the MDC's warehouse will continue to process and log the mail and the legal department will deliver the mail to the inmate. Legal counsel at the MDC has indicated that they call or stop by the warehouse every day or every other day to check for packages that have been delivered for the Legal Department.¹ Legal counsel at

¹ The Government will continue to inform legal counsel at the MDC when it sends a hard drive to the attention of legal counsel, which goes to the MDC's warehouse as outlined in the Government's October 15, 2021 letter (Dkt. No. 350).

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the MDC also noted that defense counsel can deposit legal mail in the MDC's legal mailbox during visiting hours (between 8 a.m. and 8 p.m.); MDC's mail room staff picks up such mail between approximately 6 a.m. and 2 p.m. once every business day and logs the mail, which is then delivered to an inmate by the unit manager. According to legal counsel at the MDC, any additional steps would be extremely burdensome and not practicable in light of the various responsibilities of the MDC's legal department and staff, which are responsible for issues relating to the approximately 1,700 inmates at the MDC.

Respectfully submitted,

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By: _____ s/

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Cc: Defense Counsel (By ECF)